## UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

UNITED STATES OF AMERI	CA, )		
Plainti	ff, )	TMPODMATTON	CR 11-266 SRN
v.	ý	(18 U.S.C. §	
MUSTAFA HASSAN MUSSA,	ý		
Defenda	nt, )		

THE UNITED STATES ATTORNEY CHARGES THAT:

## COUNT 1 (Aggravated Identity Theft)

- 1. At all times material to this Information, defendant operated Universal Home Health Care, Inc. ("Universal"), a home health care agency located in the City of Golden Valley in the State and District of Minnesota.
  - 2. On or about May 26, 2009, defendant,

## MUSTAFA HASSAN MUSSA,

by and through Universal Home Health Care Inc., did knowingly cause to be used and transferred, without lawful authority, a means of identification of R.C., a known adult male, to-wit the Personal Care Assistant ("PCA") Provider Number issued to R.C. by the Medicaid Program, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), namely health care fraud.

3. The May 26, 2009, claim submitted to Medicaid falsely identified R.C. as the PCA who was purportedly providing services to a Medicaid recipient. The claim was one of a substantial number

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U.S. DISTRICT COURT MPLS

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of Medicaid claims submitted through Universal to DHS between 2008 and 2010 identifying a PCA in the claim who had not in fact provided services to the Medicaid recipient for whom service was being billed.

4. All in violation of Title 18, United States Code, Section 1028A.

Dated: Aug. 18,2011

Respectfully submitted,

B. TODD JONES United States Attorney

BY: David M. Genrich Assistant U.S. Attorney Attorney ID No. 0281311